

COMMENTS FOR THE OPEN COMMENT PERIOD EXPIRING OCTOBER 21, 2016 ON
DOCKET NUMBER TF-2016-0321

Thank you to the Iowa Utilities Board for allowing public comment in its effort to find a fair and equitable regulatory plan for Iowa's electricity future.

Like most Iowans I believe in eliminating waste, helping our local and state economy and investing in the future. Customer owned solar and wind distributed generation fits all of those categories. I don't think our state utility regulator, the Iowa Utilities Board, wants to DISCOURAGE DISTRIBUTED GENERATION so I would like to offer the following comments:

It is good to see the Net Metering cap increased for Large General Service customers from 500 KW to 1 MW however not including demand charges and other charges in the net metering credit back calculation DISCOURAGES DISTRIBUTED GENERATION. Large General Service customers want to use solar to offset demand charges.

Provisions must be made to include third party developers if the board wants to encourage Distributed Generation. Leaving out third party investors DISCOURAGES DISTRIBUTED GENERATION. I am a third party solar Distributed Generation developer/investor. Tax-exempt entities, government entities and capital short businesses benefit from third party investors who help those entities meet expense reduction and carbon emission goals.

Utilities limit customer owned solar array development to on-site locations, which DISCOURAGES DISTRIBUTED GENERATION (DG). Most businesses and homes lack the appropriate site for a solar array. Off-site, customer owned and virtual net-metered solar arrays provide for community economic growth and permit customers to eliminate waste and invest in the future. If off-site solar development were permitted many more customers would become (DG) customers.

Avoided Cost rates should be more transparent and relate to the production system and its location. The avoided cost rates vary with wind, solar, natural gas, and coal and vary with local production and local use compared to long-distance production and local use. The avoided cost rates need to be viewed as fair and equitable if the board wants to avoid DISCOURAGING DISTRIBUTED GENERATION.

Please uphold the Board's position on Utilizing a straightforward and commonsense approach to calculating customers load based on historical or anticipated annual energy usage, consistent with over two years of testimony in this docket and MidAmerican's net billing tariff.

Limiting the period for "banking" excess solar production DISCOURAGES DISTRIBUTED GENERATION. We can use solar power to operate Geo-thermal

heating systems and other seasonal pumps and motor if the “banking” period is not limited. Solar power is being produced in the summer mid-day when air-conditioners and traditional places of employment are typically demanding peak power. It should be a win-win if the grid system is managed properly. “Banking” should allow greater opportunity for more efficient customer and utility grid management. The value of solar power needs to be fully evaluated.

Helping low income people by using the cash out funds sounds good if those diverted cash out funds are used to reduce electrical costs in low income homes by installing efficiencies or renewable energy in those homes. The concept of diverting net metering value to other causes DISCOURAGES DISTRIBUTED GENERATION.

The board has indicated it wants to encourage renewable energy development while balancing the interest of customers and utility. Customer owned Distribute Generation should be encouraged as a part of the balance. Currently there is an insignificant amount of electricity produced by customer owned Distributed Generation.

Customer owned solar Distributed Generation is providing financial assistance to non-DG customers. Solar DG customers are assuming risk through their solar array investment. On the one hand government encourages distributed generation risk taking with the reward of the tax incentives, however some state regulators are viewing customer owned DG as a financial disadvantage for non-DG customers. Customer owned DG is the same as investor owned utility wind and solar power. There would be more risk taking DG customers and less concern for DG and non-DG customer inequity if off-site solar development were permitted.

Existing net metering rules should not be limited. Favorable net metering rules encourage Distributed Generation, which provides the greatest opportunity for energy conservation and reducing waste. Ownership and localization of power production teaches practical use and encourages investment in efficiency where it counts in Iowa communities.

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